

Overseas Purchase Card Guidelines



April, 1998

V. Management and Administration

Administration

Number	Title
---------------	--------------

XXX.X	International Trade Administration Overseas Purchase Card Guidelines
-------	--

SECTION 1: The purpose of this chapter is to transmit policy changes to International Trade Administration (ITA) Purchase Cardholders located outside the continental United States. “Purchase Card guidelines for Overseas Cardholders” dated March 11, 1994 is rescinded.

SECTION 2: This chapter sets forth the management responsibilities and duties associated with administering the Department’s Purchase Card Program. It outlines the responsibilities of cardholder and approving officials; sets forth limitations on the use of the card, billing and payment procedures. This policy applies to all ITA employees located outside the continental United States.

SECTION 3: Not Applicable

SECTION 4: The purchase card should be used whenever possible to buy small purchases under the micro-purchase threshold of \$2,500 for official business. Authorized purchases should also be made over this amount up to \$25,000 by individuals designated as a Level I Contracting Officer with \$25,000 single purchase authority. Foreign Service Nationals (FSN) may be designated as \$2,500 cardholders. FSN cardholders are required to have an approving official that is a U.S. citizen. Personal Services Contractors (PSC) may not be cardholders. Personal use of the card is strictly forbidden.

MANAGEMENT RESPONSIBILITIES

a. The Director, Office of Organization and Management Support (OOMS) is responsible for the management of the Purchase Card Program for the International Trade Administration (ITA).

b. The Director of Administration for ITA approves and nominates officers for Level I Contracting authority with the concurrence of the Deputy Assistant Secretary for International Operations, US&FCS.

c. The Head of Contracting Office (HCO) is the individual who manages the Purchase Card Program for the Department Procurement Executive. The HCO has the authority to add controls in any area to fulfill their responsibilities. The HCO is responsible for:

- (1) Delegating Purchase Card authority and purchase limits in accordance with Commerce Purchase Card policies and procedures;
- (2) Appointing cardholder approving officials to review cardholder accounts;

- (3) Reviewing the Purchase Card Program at least once a year to ensure cardholders and approving officials use internal controls and follow proper procedures. A sample of the information to be covered in the annual review may be found in Section 21.
 - (4) Ensuring that all cardholders whose single purchase limit is over \$2,500 have received the appropriate training and have executed a "Procurement Integrity Certificate" on file.
 - (5) Ensuring the purchase card is being used properly by conducting periodic reviews and determine whether to withdraw delegations and appointment if misuse is found.
 - (6) Ensuring cardholders' statements reach ITA Accounting for payment by the 20th of each month.
 - (7) Ensuring all cardholders possess requisite business acumen to make sound decisions, that they have completed required training and review their historical performance record before issuing purchase cards.
- d. The Rocky Mountain Bankcard System (RMBCS) Inc. Operates the Government wide Purchase Card Program and maintains all Government accounts and records.
- e. The Regional Director, US&FCS/OIO, will serve as the approving official for micro purchase (\$2,500) cardholders and participate with OOMS staff in the review of audit findings, and implementation of corrective action as outlined in the audit report.
- f. The Regional Director, US&FCS, will submit nominations for Level I Contracting authority and Approving Officials in writing to the DAS/OIO.
- g. Commerce Bankcard Center (CBC) is located in Kansas City, Missouri and is responsible for:
- (1) Providing support for the operation and administration of the Department of Commerce Purchase Card Program;
 - (2) Processing Purchase Card applications, maintenance and cancellations; responding to statement and transaction related questions;
 - (3) Making temporary changes to purchase limits and merchant transaction activity codes;
 - (4) Monitoring "Questioned Items" and providing support throughout the disputes process;
 - (5) Operating a "Hotline" to support cardholders

7. DELEGATIONS

The Deputy Assistant Secretary for International Operations, (DAS/OIO) and the appropriate US&FCS Regional Director may delegate \$2,500 purchase authority to cardholders. Overseas cardholders are authorized \$2,500 single purchase authority with a monthly billing cycle limit of \$10,000. Only the HCO with the written approval of the Director of Administration, may grant \$25,000 single purchase authority with a monthly billing cycle limit of \$50,000 on a case-by-case basis.

8. ELIGIBILITY AND TRAINING

Officers nominated to receive \$25,000 single purchase authority are proposed by the DAS/OIO. OOMS ensures the proposed officer(s) has no history of unauthorized commitments, possesses the requisite business acumen to make sound decisions, has completed Simplified Acquisition Procedures training, and has successfully completed the qualifying examination. The employee's historical performance which includes their responsibility, ethics and record shall be reviewed before a card is issued. \$25,000 single purchase authority will only be granted to those officers who satisfy the aforementioned requirements. Foreign Service Nationals are required to attend Simplified Acquisition Procedures training, and successfully complete the qualifying examination before a card may be issued.

9. STANDARDS OF CONDUCT

Cardholders and approving officials must comply with applicable standards of conduct. Employees who knowingly misuse the purchase card for personal or other unofficial use are subject to administrative actions, remedies and penalties. If any misuse is found, the cardholder, approving official, relevant Regional Director and OOMS shall inform the DAS/OIO. OOMS, the Director of Administration and HCO shall determine appropriate action to be taken.

10. APPROVING OFFICIAL RESPONSIBILITIES

Approving officials for \$2,500 Cardholders shall:

- (1) Designate officers as cardholders for \$2,500 cards;
- (2) Request monthly limit increases through OOMS;
- (3) Ensure the cardholder immediately reports missing, lost and/or stolen cards to OOMS, and the CBC;
- (4) Maintain accurate records regarding the Purchase Card Program and update account information as appropriate;
- (5) Review cardholder monthly statements for authorized use;
- (6) Ensure accounts are properly closed when officers leave the US&FCS or the Post. This includes accounts for cardholders who resign, retire or who are terminated and leave the US&FCS before the billing cycle has ended;

- (7) Report misuse to OOMS;
- (8) Ensure monthly statements are received in ITA accounting by the **20th** of each month;
- (9) Appoint an alternate approving official in writing to act in his/her absence. Attach a memo with the monthly statement so that ITA accounting will know who is authorized to sign the monthly statement in the approving official's absence, and;
- (10) Ensure cardholders report accountable property purchased with the Card to the US&FCS Regional Property Custodian. **Accountable property is property that is valued at \$2,500 or above or designated as "sensitive". Property designated as sensitive is: photocopy machines, video cameras, video cassette recorders, televisions, personal computers, laptop computers, disk drives, printers, plotters and facsimile machines.**

12. **CARDHOLDER RESPONSIBILITIES**

\$2,500 Cardholders shall:

- (1) Use the purchase card only for authorized official purchases. **Cards may not be used by any person other than the person designated on the card;**
- (2) Report lost or stolen cards promptly to the approving official, and the CBC at (816) 823-3847. You may fax questions to the CBC at (816) 823-3850;
- (3) Review the purchase card training video prior to being set up with an active purchase card account;
- (4) Stay within the assigned single purchase limit. No split purchases are allowed. **A split purchase is defined as a purchase where a cardholder intentionally divides what should be a single purchase into two or more separate purchases/transactions occasions to avoid exceeding the single purchase limit;**
- (5) Maintain **1** purchase card ordering log for **BOTH** O&A and Deposit Fund transactions. Cardholders will use **1** purchase card to acquire items using O&A and Deposit funds. **Deposit Fund purchases shall be limited to the purchase of goods and services relating to trade events with approved fiscal plans and budget authorization cables.** See Attachment A for sample log;
- (6) Contact the CBC at (816) 823-3847 or by fax at (816) 823-3850 for assistance if the purchase card is rejected while making a purchase;

- (7) Always request exemption from in-country sales tax, U.S. sales tax and value added tax. If a merchant requires a U.S. tax exempt certificate, contact the CBC. CBC can provide a copy of the tax exempt letters on hand for each state except Alaska and Hawaii. The U.S. Government tax exempt number for the International Trade Administration is 4716. In-country sales tax exemptions are granted upon presentation of diplomatic identification. Value added tax (VAT) exemption is usually granted where the purchase price exceeds a certain dollar amount and when a VAT exempt certificate is issued by the U.S. Embassy and is presented to the merchant, and;
- (8) Keep the purchase card in a secure place.

\$25,000 Cardholders shall:

- (1) Comply with items (1)-(8) listed under **\$2,500 Cardholder Responsibilities** in addition to the following items;
- (2) Determine and document that the price is fair and reasonable for purchases over \$2,500.
- a. The determination that a proposed price is reasonable should be based on competitive quotations. If only one response is received, or the price variance between multiple responses reflects lack of adequate competition, a statement should be included in the cardholder's file giving the basis of the determination of fair and reasonable price. The determination may be based on a comparison of the proposed price with prices found reasonable on previous purchases, current price lists, catalogs, advertisements, similar items in a related industry, value analysis, the cardholder's knowledge of the item being purchased or any other reasonable basis.
 - b. When other than price related factors are considered in selecting the supplier, the cardholder should document the file to support the selection decision. Cardholder may evaluate quotations or offers based on price alone or price and other factors e.g., past performance or quality.
 - c. If only one source is solicited, an additional notation shall be made to explain the absence of competition.
 - d. Simplified documentation practices should be used. For instance, the cardholder should establish and maintain informal records of oral price quotations in order to reflect clearly the propriety of placing the order at the price paid with the supplier. In most cases, this will consist merely of showing the names of the suppliers contacted and the prices and other terms and conditions quoted by each.
 - e. Cardholder should retain data supporting purchases using simplified acquisition procedures to the minimum extent and duration necessary for management review purposes.

- f. Although the documentation requirements above are not required to support micro-purchases (purchases under \$2,500), the cardholder shall ensure the price is fair and reasonable.

NOTE: All Government purchases over the micro-purchase threshold of \$2,500 up to the "Simplified Acquisition Threshold of \$100,000" are by law reserved for small businesses. This includes purchases made with the Purchase Card. When preparing to make a purchase over \$2,500, inquire first as to the size of the business e.g., small or large. A large business should only be used when items required for purchases cannot be provided by a small business. The cardholder must document the file for using a large business over the micro-purchase level. Documentation should address attempts to locate small businesses.

13. LIMITATIONS

The Purchase Card **may not** be used for the following:

- a. Cash advances;
- b. Rental or lease of land, building or trade event booth space;
- c. Janitorial or yard maintenance services;
- d. Personal convenience items such as coffeepots, membership fees, parking tickets, business cards, personal fines;
- e. Fuel, oil, services, maintenance and repair by GSA;
- f. Purchase or lease of vehicles;
- g. Rental or lease of vehicles while on official travel;
- h. Airline, bus, boat, train tickets or other travel related tickets;
- i. Building services and alterations;
- j. Travel meals, drinks or lodging and;
- k. Representational expenses e.g., items related to the conduct of official entertainment as defined by the Chief of Mission.

14. ITEMS REQUIRING SPECIAL AUTHORIZATION AND APPROVAL

TRADE EVENTS

Cardholders and Approving Officials must have written authorization from the Office of Trade Event Management and the Office of Financial Management using current fiscal plan and cable authorization procedures **BEFORE THE FOLLOWING ITEMS MAY BE PURCHASED:**

- a. Meals and or drinks for overseas trade event hospitality
- b. Paid advertisements in newspapers or other publications for overseas trade events

Documents that approve the purchases shall be maintained in the Purchase Card files and a copy submitted with the monthly statement. The Event ID number shall be noted next to each transaction that appears on the statement and in the Purchase Card Log.

GRATUITIES

Cardholders and Approving Officials must have written authorization from the Deputy Assistant Secretary for International Operations using current fiscal plan and cable authorization procedures **BEFORE** gratuities may be purchased. A gratuity is defined as an item that is \$20.00 or less in value and is restricted to persons **NOT** employed by the United States e.g., foreign business partners. Gratuities are limited to those foreign countries where the exchange of items is customary and to those instances where it is necessary for the promotion or advancement of ITA's mission. The expense must be incurred in the foreign country or area of assignment. Purchases made in the United States for use overseas are strictly forbidden.

15. PURCHASE CARD AS A METHOD OF PAYMENT

The Purchase card may be used as a method of payment when ordering against Blanket Purchase Agreements; Indefinite Delivery, Indefinite Quantity type contracts; GSA Federal Supply Schedule contracts; and other similar contractual arrangements, provided the order does not exceed the delegated single purchase threshold and the contract contains appropriate language authorizing the use of the purchase card as a method of payment.

16. PLACING AN ORDER

When placing an order, the cardholder should ensure that the merchant:

- a. Is a small business (if making a purchase over the micro-purchase threshold of \$2,500);
- b. Provides total charges, including shipping and handling costs, if applicable;
- c. Includes a packing slip if the order is shipped;

- d. Includes the cardholder's name, office billing address and office telephone number on the shipping label.

17. **RECEIPT OF SUPPLIES AND SERVICES**

- a. For partial deliveries where the full amount appears on the "Statement of Account", the cardholder should authorize payment only for the part of the shipment actually received and should note on the "Statement of Account" that a partial delivery has been received. The cardholder must contact the merchant to determine the status on the remainder of the shipment. The cardholder should follow up with the merchant as necessary and make every effort to resolve the partial delivery before contacting the CBC. If the partial delivery becomes a dispute, contact the CBC for assistance. If the delivery of the remaining supplies will take more than 30 days, the cardholder should ask the merchant to credit the account. If the merchant will not credit the account or if negotiations with the merchant are unresolved, the cardholder must complete a "Statement of Questioned Item" form and submit it with any supporting documentation to the CBC.
- b. Cardholders should promptly return any damaged or unacceptable supplies. If the merchant agrees to replace the item and the new item is acceptable, the cardholder should authorize payment on the "Statement of Account" in accordance with normal procedures. If the merchant refuses to replace the item, the cardholder should follow the instruction in c below.
- c. The cardholder should, whenever possible, obtain a credit voucher from the merchant when returning supplies and attach a copy of the voucher to the "Statement of Account" on which the credit appears. If the merchant is unwilling to issue a credit voucher, the cardholder should note the returned purchase(s) on the "Statement of Account and indicate the item was returned. The cardholder should also complete a "Statement of Questioned Item" form and submit the documentation to CBC within **45** days of the invoice. See attached sample.
- d. If a merchant delivers supplies to a central receiving area, the cardholder should arrange with the receiving area to inspect the supplies immediately. If someone other than the cardholder signs a delivery receipt for the items purchased, the cardholder must determine when the goods were received and note the receipt and inspection of items on the file copy of the Purchase Card Ordering Log.

The Commerce Bankcard Center (CBC) will provide assistance to resolve or reconcile account problems.

18. **REPORTING ACCOUNTABLE PROPERTY**

Cardholders must report accountable property purchased with the Card to the US&FCS Regional property custodian assigned to provide property support to the cardholder's duty station. Cardholder's should become familiar with the property accountability thresholds of the Department. **Accountable property is property that is valued at \$2,500 or above or designated as "sensitive" regardless of the dollar value. Property designated as sensitive**

are: photocopy machines, video cameras, video cassette recorders, televisions, personal computers, laptop computers, disk drives, printers, plotters and facsimile machines.

19. BILLING AND PAYMENT OF PURCHASE CARD TRANSACTIONS

- a. Monthly statements must be received in ITA Accounting by the **20th** of the month. The statement billing cycle closes by the 27th of each month. Beginning in FY 98 statements will be sent direct to overseas cardholders. If a cardholder does not receive a statement within 15 business days after the close of the billing cycle, the cardholder must contact the CBC and request that a replacement statement be faxed to them.
- b. Cardholders **MUST** include the following documents and notations with their statement:

- (1) original receipts
- (2) purchase card log
- (3) credit receipts
- (4) questioned item forms
- (5) write the appropriation, cost center, project code and object class on the statement next to each transaction i.e., J/X01/3400/12-XX/XXXX
- (6) write the description of the item purchased on the statement next to each transaction
- (7) statements of work (\$25,000 cardholders only)
- (8) sole source justifications (\$25,000 cardholders only)
- (9) evidence of competition and price quotes (\$25,000 cardholders only)
- (10) notice of posting (\$25,000 cardholders only)

SEE ATTACHMENT A FOR SAMPLES

- c. Card purchases are subject to the Prompt Payment Act. Cardholders and approving officials must ensure that certified and verified statements are promptly submitted to ITA Accounting for payment by the **20th** of each month to avoid late penalty fees. If a cardholder knows in advance that he/she will be absent and not available to reconcile the monthly statement, the cardholder must forward all appropriate documentation (logs, original sales receipts, credit vouchers, etc.) to the approving official. The approving official shall reconcile and send the statement to ITA Accounting.
- d. Cardholders and approving officials shall use the most expedient means for sending monthly statements to ITA Accounting by the **20th** of each month e.g., mail or international courier service such as Federal Express or DHL).
- e. Statements should be addressed to:

U.S. Department of Commerce
International Trade Administration/Accounting Div.
14th & Constitution Ave. NW. Rm. 4113
USA Washington, DC 20230

20. RECONCILIATION OF ACCOUNT

The cardholder shall:

- a. Review all information for accuracy. If a transaction is billed incorrectly, the cardholder should provide an explanation of the “Statement of Account” and fill out a “Questioned Item” form and submit it to the CBC;
- b. Describe each item listed on the Description line of the statement in enough detail to recognize the item;
- c. Attach any special approvals or authorizations to the statement;
- d. Put the account code for each transaction on the accounting code line, if different from the code listed at the top of the statement;
- e. Attach original sales or shipping receipts to the statement;
- f. Attach the Purchase Card Order Log;
- g. Certify the statement by signing it;
- h. Forward the statement and attachments to the approving official in sufficient time to permit careful review and ensure the statement is received in ITA Accounting by the 20th of the month;
- i. Keep copies of all documents.

The Approving official shall:

- a. Review cardholder’s statements, verifying that all items are necessary Government purchases and comply with all applicable acquisition guidance;
- b. Resolve any outstanding questions, verify, certify, and sign each cardholder statement;
- c. Ensure the original, certified and approved statement is sent to ITA accounting by the 20 of each month, to avoid prompt payment penalties;
- d. Ensure Questioned Item form along with supporting documentation is submitted to the CBC and attached with the statement sent to ITA accounting.

21. RECORDS MAINTENANCE

Purchase card records must be retained for 39 months after the end of the fiscal year in which the transactions occurred.

22. **PROBLEMS AND TECHNICAL QUESTIONS**

If your Purchase Card is rejected while trying to make a purchase contact the Commerce Bankcard Center at (816) 823-3847 or by fax at (816) 823-3850.

SECTION 5: Questions on appropriate use of the card should be directed to the ITA Purchase Card Coordinator in the Office of Organization and Management Support at (202) 482-5436 or by fax at (202) 482-4066.

23. **AUDIT CRITERIA**

The Office of Organization and Management Support will conduct audits of overseas cardholders and approving officials. Findings shall be reported and reviewed with the Regional Director and where appropriate the DAS/OIO, Director of Administration and HCO. The audit criteria are listed below:

Transactions:

- authorized purchases by cardholder only
- split purchases
- questionable transactions

Competition:

- obtained where required
- prices fair and reasonable
- written quotes
- documentation of phone quotes

Documentation:

- transaction logs/records
- receipts/invoices
- description of items

Prompt Payment:

- submission of statement by 20th of each month

Cardholder Activity:

- items purchased from required sources of supply (if applicable)

Limits:

- exceeded
- adequate for the usage
- within ITA policies

Personal Property

- accountable property appears in Personal Property System

PURCHASE CARD LOG

CARD HOLDER: Lisa M. Gallina

SINGLE PURCHASE LIMIT: \$25,000

MONTHLY LIMIT: \$200,000

November 13, 1997

<u>Date</u>	<u>Vendor</u>	<u>Description</u>	<u>Quantity</u>	<u>Unit Cost</u>	<u>Total Cost</u>
9-25-97	Maryland Computer Systems, Inc. Back order	HP Laser Jet 5 Printer OOMS staff	2	\$1,040.00 ea	\$2,080.00
9/30/97	Windows Catering	Trade Development Event ID# 97001174 South African Trade & Investment Conference	400 guests	See Attached Quote	8,376.60
10-01-97	Sign Lang. Asso. Inc	Combined Federal Campaing Kick Off Interpreting Svcs. & transportation	1 hr.	\$195.00 \$ 4.00	\$199.00
10-02-97	Maryland Computer Systems, Inc.	External CD-ROM 2X recorder 6X read	1		\$526.00
10-2-97	B&B Catering	U.S. Korea Committee On Bus. Cooperation Approved Hospitality on file	70 guests	See Attached Quote	\$3,302.50

HQ WASHINGTON DC
ARTHUR D JOHNSON
ITA O FIN MGMT ACCT DV RM 4113
14TH & CONSTITUTION AVE NW
WASHINGTON DC 20230-0000

LISA GALLINA
DOC ITA DOA OOMS
14 & CONST AVE NW
RM 4001
WASHINGTON DC 20230-0000

PAGE 2
10 27 97
TOTAL 30,454.91
APPROVING OFFICIAL

DOC ITA DOA OOMS
MARY ANN MCFATE
14 & CONSTITUTION NW
ROOM 4001
WASHINGTON DC

STATEMENT OF ACCOUNT U.S. GOVERNMENT CREDIT CARD

20230-0000

VISIT THE WEB SITE FOR THE COMMERCE BANKCARD CENTER

[HTTP://WWW.CASC.NOAA.GOV/CBC/BANKCARD.HTML](http://WWW.CASC.NOAA.GOV/CBC/BANKCARD.HTML)

PURCHASE DATE	PROCESSING DATE	MERCHANT NAME	AMOUNT
REFERENCE NUMBER	MERCHANT LOCATION / SIC CODE		
09/30/97*XV 09/30	WILLARD INTER-CONTINENTAL	2876.25	
24661027273980008827053	WASHINGTON DC 3512		
DESCRIPTION	Banquet Svcs. South African -- Business Develop. Comm. Approved Hospitality Request		
FOOTG CODE	J/801/XXXX/XX-XX/1234		
09/30/97 XV 10/01	CATERING BY WINDOWS	8376.60	
24418007274274052108801	ALEXANDRIA VA 5811		
DESCRIPTION	TD Event ID#97001174 South African Trade & Invest. Conf.		
FOOTG CODE	J/720/9606/67-00/2593		
09/30/97 XV 10/01	CATERING BY WINDOWS	3087.50	
24418007274274052108900	ALEXANDRIA VA 5811		
DESCRIPTION	Luncheon-Environmental Bus. Summit Approved Hospitality Request		
FOOTG CODE	J/701/XXXX/XX-XX/2599		
10/02/97 XV 10/03	APPLICATION TECHNOLOGY	7979.00	
24448007276172760363662	FAIRFAX STAT VA 5964		
DESCRIPTION	CD-410 Automation Pilot-application development & software		
FOOTG CODE	J/701/XXXX/XX-XX/2599		
10/03/97*XV 10/03	SAFEMASTERS 99	2709.77	
24229107276000289084530	SILVER SPRING MD 7393		
DESCRIPTION	DOC Telecom Center Alarm Enhancements		
FOOTG CODE			
10/06/97 XV 10/07	GRAHAM STAFFING SVC.	198.80	
24897397280462509260013	WASHINGTON DC 7399		
DESCRIPTION	Congressional Response Team Data Entry Svcs. OHRM approval on file		
FOOTG CODE	J/801/XXXX/XX-XX/2599		
10/06/97 XV 10/07	GRAHAM STAFFING SVC.	319.50	
24897397280462509260021	WASHINGTON DC 7399		
DESCRIPTION	Congressional Response Team Data Entry Svcs. "	"	
FOOTG CODE	J/801/XXXX/XX-XX/2599		
10/06/97 XV 10/07	GRAHAM STAFFING SVC.	56.80	
24897397280462509260047	WASHINGTON DC 7399		
DESCRIPTION	Congressional Response Team Data Entry Svcs. "	"	
FOOTG CODE	J/801/XXXX/XX-XX/2599		
10/06/97 XV 10/07	GRAHAM STAFFING SVC.	447.30	
24897397280462509260153	WASHINGTON DC 7399		
DESCRIPTION	Congressional Response Team Data Entry Svcs. "	"	
FOOTG CODE	J/801/XXXX/XX-XX/2599		

TOTAL

TURN TO REVERSE SIDE FOR CERTIFICATION OF PURCHASE

ROCKY MOUNTAIN BANKCARD SYSTEM[®]
I.M.P.A.C.[®] PROGRAM
CARDHOLDER STATEMENT OF QUESTIONED ITEM

(Please print or type in black ink.)

Janice S. Smith

4716130200000000

CARDHOLDER NAME (please print or type)

00/00/00

ACCOUNT NUMBER

202-482-0000

CARDHOLDER SIGNATURE

DATE

TELEPHONE NO.

The transaction in question is described below:

Transaction Date

Reference #

00/00/00

24000000000000000000

Merchant Name
Corner Stone

Amount
\$159.00

Statement Date
00/00/00

Please read carefully each of the following situations and check the one most appropriate to your particular dispute. If you have any questions, please contact us at 800/227-6736. We will be more than happy to advise you in this matter.

If the statements below are not applicable please send a letter of explanation regarding your dispute. Please, list all pertinent information and include your account number and signature.

I. CARDHOLDER DISPUTE (Cannot be used until resolution is attempted with the merchant.)

< > I did participate in the above transaction, however, I dispute the entire charge, or a portion, in the amount of \$ _____ because (please be specific) _____

NOTE: Provide completed description of problem, attempted resolution, and outstanding issues. Use a separate sheet of paper, if necessary, and sign your description statement.)

II. UNAUTHORIZED MAIL OR PHONE ORDER

☒ I have not authorized this charge to my account. I have not ordered merchandise by phone or mail, or received any goods or services.

III. DUPLICATE PROCESSING

< > The transaction listed above represents multiple billing to my account. I only authorized one charge from this merchant for this amount. My card was in my possession at all times.

IV. MERCHANDISE OR SERVICE NOT RECEIVED

< > My account has been charged for this above listed transaction, but I have not received the merchandise or service. I have contacted the merchant but the matter was not resolved. (Please provide a separate statement detailing the merchant contact, and the expected date to receive merchandise.)

< > My account has been charged for this above listed transaction. I have contacted this merchant on _____ (date) and cancelled the order. I will refuse delivery should the merchandise still be received.

V. MERCHANDISE RETURNED

< > My account has been charged for the above listed transaction, but the merchandise has since been returned for the following reason: _____

Enclosed is a copy of my postal or UPS receipt.

VI. CREDIT NOT RECEIVED

< > I have received a credit voucher for the above listed charge, but it has not yet appeared on my account. A copy of the credit voucher is enclosed. (Please provide a copy of this voucher with this correspondence.)

VII. ALTERATION OF AMOUNT

< > The amount of this charge has been altered since the time of purchase. Enclosed is a copy of my sales draft showing the amount for which I signed.

VIII. INADEQUATE DESCRIPTION/UNRECOGNIZED CHARGE

< > I do not recognize this charge. Please supply a copy of the sales draft for my review. I understand that when a valid copy is sent to me, a statement of questioned item must be provided to include the copy of the sales draft if a further dispute exists. If a copy cannot be obtained, a credit will appear in my account.

IX. COPY REQUEST

< > I recognize this charge, but need a copy of the sales draft for my records.

X. SERVICES NOT RECEIVED

< > I have been billed for this transaction, however, the merchant was unable to provide the services for the following reason(s): _____

< > paid for by another means. My card number was used to secure this purchase, however final payment was made by check, cash, another credit card, or purchase order. (Enclosed is my receipt, cancelled check (front & back), copy of credit card statement, or applicable documentation.)

XI. NOT AS DESCRIBED

< > (Cardholder must specify what goods, services, or other things of value were received.) The item(s) specified do not conform to what was agreed upon with the merchant. (The cardholder must have attempted to return the merchandise and state so in his/her complaint.)

★★ SEND ORIGINAL TO: DOC BANKCARD CENTER, 601 E. 12TH ST., FOB ROOM 1702, KANSAS CITY, MO 64106, WITH A COPY OF YOUR STATEMENT. ★★

★★ SEND A COPY OF THE QUESTIONED ITEM FORM WITH ORIGINAL STATEMENT TO FINANCE PAYMENT OFFICE. ★★

U.S. Dept. of Commerce

International Trade Administration
Office of Organization and Management Support
14th & Constitution Ave. N.W. Room 4001
Washington, DC 20230
VOICE 202-482-5436
FAX 202-482-4066

FAX TRANSMISSION COVER SHEET

DATE: November 13, 1997

TO: Brian O'Laughlin
Windows Catering
703-739-4875

FAX: 703-519-8221

SUBJECT: Catering Services Order

SENDER: Lisa Gallina
Team Leader, Management Services

YOU SHOULD RECEIVE **2** PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 202-482-5436

I authorize Windows Catering to charge the government VISA card in the amount of \$3,087.50 for catering services in support of the Environmental Business Summit hosted by Commerce Secretary Daley. Charges should be billed immediately following the event to the government VISA card. The reception will be held on Monday, September 29, 1997 for 125 guests at 6:00 p.m. at the Dept. of Commerce.

Eric Fredell will serve as the on site technical contact. Lisa Gallina, VISA cardholder and Mary Ann McFate, VISA card approving official are the only government employees that have authority to authorize additional service or changes in service that will result in the Government to incur expenses over \$3,087.50.

Services and menu selection are authorized in accordance with the September 12, 1997 quote.

Method of Payment: Government VISA Card

VISA Card Number: 4716-1302-0000-XXXX

Expiration Date: November 1998

Card Holder: Lisa M. Gallina

Total Payment: \$3,087.50

Business Type:

(Bold)	A1	8 (a)
	A2	Small Disadvantaged (Minority) Business
	A3	Other Small Business or Individual
	A5	Small Disadvantaged (Minority) and Woman Owned
	A6	Other Small Woman Owned business or individual
	B1	Large Business

Method of Procurement: _____ Delivery Order for GSA or Other Federal Schedules
 _____ XX Open Market (FAR Part 13)

GSA/Federal Contract Number (if applicable): GS-35F-3081D

Competition: _____ XX Competed
 _____ Not available for competition (order does not exceed \$2,500)

Procurement

Posted: _____ XX Not Required if procurement is less than \$10,000
 _____ Required if procurement value is greater less than \$10,000

Competitive quotes and domestic hospitality authorization on file with agency.

DESCRIPTION/SPECIFICATIONS/WORK STATEMENT

A. 1 STATEMENT OF WORK/SPECIFICATIONS

The Contractor shall furnish the necessary personnel, material, equipment, services and facilities (except as otherwise specified), to perform the following Statement of Work/Specifications. The Government anticipates charges paid under this agreement will be under \$25,000 and will be paid using the Government VISA card.

A. 2 STATEMENT OF WORK

The Department of Commerce, International Trade Administration (ITA), U.S. and Foreign Commercial Service (US&FCS) is conducting a Worldwide Commercial Service Conference. The conference date is set for January 21, 1996-January 26, 1996.

CONFERENCE DATE, TIME LOCATION AND NUMBER OF PARTICIPANTS

Sunday	January 21	2:00 Noon to 10:00 p.m.
Monday	January 22	8:00 a.m. to 6:00 p.m.
Tuesday	January 23	8:00 a.m. to 6:30 p.m.
Wednesday	January 24	8:00 a.m. to 6:30 p.m.
Thursday	January 25	8:00 a.m. to 6:00 p.m.
Friday	January 26	8:00 a.m. to 6:00 p.m.
Saturday	January 27	8:00 a.m. to 12:00 Noon

Number of participants: Approximately 160

A. 3 Maria Tildon has been designated the Contracting Officer Technical Representative (COTR) for this requirement. Any technical guidance shall only be provided by this individual. Any changes that will impact the cost of this requirement can only be authorized by Lisa M. Gallina.

A. 4 Federal Travel Regulations limit lodging expenses for Dade County, Florida to \$74.00 per day. Meals and incidental expenses are limited to \$38.00 per day. The total per diem rate is \$112.00 per day.

B. 1 Guest Room Rates

The contractor shall provide sleeping accommodations within the limitations of the per diem allowance which is \$74.00 per day. Total accommodations for 160 persons. Accommodations will be confirmed by the government 72 hours in advance, on January 18.

NOTE: Payment for rooms are not under this contract, however, the contractor should provide room rate information in its quotation. Travelers are responsible for lodging expenses.

		Number of Rooms Required	Departure
Wednesday	January 17	5	
Thursday	January 18	5	
Friday	January 19	10	
Saturday	January 20	40	
Sunday	January 21	160	
Monday	January 22	160	
Tuesday	January 23	160	
Wednesday	January 24	160	
Thursday	January 25	140	20
Friday	January 26	65	20
Saturday	January 27	0	65

Contractor shall waive room tax, 6% state tax and 3% occupancy tax. Travelers shall present government travel order as documentation for waiver upon arrival.

Check-In Time:

Contractor shall provide check-in based on room availability before 4:00 p.m.

Check-Out Time:

Bell captain will arrange to hold luggage for those guests attending functions on the day of departure. Room check out time is 12:00 Noon.

Reservations:

This procurement constitutes a guarantee of 160 lodging rooms for 4 nights, with a variance of plus (+) or minus (-) 10%. Payment is not included in this contract. Attendees will pay lodging expenses. Government shall instruct attendees to contact the hotel directly to confirm arrival and departure.

C. 1. Recreation and Spa Facilities

Excluded from the terms of this contract.

D. 1. CONFERENCE FACILITIES

Control Room Facilities For Wednesday, January 17-Saturday January 27

The contractor shall provide a meeting control room for conference coordinator and staff that must contain the following items: 2 telephones and 2 outside telephone lines, 4 work tables, 2 chairs per table, and storage space for boxed conference literature and material. Two (2) fax machines, one (1) photocopier, one (1) answering machine, two (2) computers and two (2) laser printer. Computer to be equipped with Word Perfect 5.1.

D. 2. Conference Facilities For Sunday, January 21, 1996

Registration Table-Hotel Lobby: The contractor shall provide a general registration area to accommodate registration for approximately 170 conference participants beginning at 12:00 Noon-6:00 p.m. Table/area shall be equipped with electrical outlets to accommodate laptop computer and printer, 1 telephone line, outside line and 1 message board. Four (4) tables to accommodate Welcome Kits and name tags. Tables to be skirted with linens two (2) chairs per table.

Private Reception Room: Cocktail Reception for approximately 160 attendees to be held in a separate room beginning at 7:30 p.m.-8:00 p.m. This contract does not provide for any alcoholic beverages, however, the reception should include a Cash Bar with choice of wine, beer and assorted cocktails.

Private Dining Room: Seated dinner to be held in an adjoining room for approximately 160 attendees. Dinner to be served at 8:00 p.m.-10:00 p.m. Twenty 72" round tables to accommodate a maximum of 10 persons per table. Tables shall be skirted with linens. Standing lighted podium with flexible microphone, screen, video projector, sound system, music and voice amplification. The dinner will be paid under this contract.

D. 3. Conference Facilities For Monday, January 22

General Session Room must accommodate up to 160 persons and be available for use beginning at 8:00 a.m. to 6:30 p.m. Room to be set up classroom style.

Audio Visual Equipment set-up in General Session Room: Podium, dais for panel members, microphone on podium and dais table, overhead projector, projection screen, transparency markers, flip charts, easels and markers for chart paper.

D. 4. Conference Facilities For Tuesday January 23

General Session Room must accommodate up to 170 persons and be available for use beginning at 8:00 a.m. to 6:30 p.m. Room to be set up classroom style from 8:00 a.m.-8:30 a.m..

Audio Visual Equipment set-up in General Session Room: Podium, dais for panel members, microphones on podium and dais table, overhead projector, projection screen, transparency markers, flip charts, easels and markers for chart paper.

Break Out Rooms: Four (4) break out rooms beginning at 8:30 a.m.-11:45 a.m. each room shall be equipped with overhead projector, flip charts and easels, markers. Rooms to be set-up hollow square style. **Audio Visual** requirements for each room: microphones (4) set-up to be determined. Rooms to accommodate up to 50 attendees.

D. 4. Conference Facilities For Tuesday January 23

Private Dining Room-Working Lunch: Room to be set-up to accommodate 170 persons at 72" round tables for working lunch. Linear seating for 6 persons at head table. Head table to be elevated on risers equipped with microphones for 6 panel members. One lighted podium in the middle of dais. Lunch served buffet style in same room beginning at 12:00 Noon-2:00 p.m. The lunch will be paid under this contract.

Meeting Room-Closed Forum with Director General 5:00 p.m.-6:00 p.m.: Room to be set-up classroom style. Room to accommodate up to 80 attendees.

D. 5. Conference Facilities For Wednesday, January 24

General Session Room must accommodate up to 170 persons and be available for use beginning at 8:00 a.m. to 5:30 p.m. Room to be set up theater style from 8:30 a.m.-9:00 a.m.

Audio Visual Equipment set-up in General Session Room: Podium, dais for panel members, microphone on podium and dais table, overhead projector, projection screen, transparency markers, flip charts, easels and markers for chart paper.

Break Out Rooms: A total of six (6) break out rooms. Five (5) available beginning at 9:00 a.m.-12:00 Noon, one (1) available beginning at 2:00 p.m.-5:00 p.m. Each room shall be equipped with overhead projector, flip charts and easels, markers. Rooms to be set-up hollow square style with microphones (1) one for every (2) two persons. Rooms to accommodate up to 50 attendees.

Meeting Room-Closed Forum with Director General 5:00 p.m.-6:30 p.m.: Room to be set-up classroom style. Room to accommodate up to 80 attendees.

D.6. Conference Facilities For Thursday, January 25

General Session Room must accommodate up to 170 persons and be available for use beginning at 8:00 a.m. to 9:00 a.m. Room to be set up theater style.

Audio Visual Equipment set-up in General Session Room: Podium, dais for panel members, microphone on podium and dais table, overhead projector, projection screen, transparency markers, flip charts, easels and markers for chart paper.

Break Out Rooms: A total of fourteen (14) break out rooms.

Time	Rooms Needed	Accommodate	Set-Up
8:00 a.m.-12:00 Noon	1	80 people	Classroom
8:30 a.m.-1:00 p.m.	1	35 persons	Classroom
1:00 p.m.-6:00 p.m.	3	25 persons	Inverted U
2:00 p.m.-5:00 p.m.	9	9 people per room	Round table

Audio Visual Requirements for Break Out Rooms-25 Persons: For rooms that accommodate 25 people: Two easels (2) per room, flip chart paper for each, color markers, overhead projector, projection screen, podium. VCR and color monitor for the morning of Jan. 25.

Private Dining Room/Banquet Hall-Lunch with Secretary Brown: Room to be set-up to accommodate 200 persons at 72" round tables for lunch.

Audio Visual Requirements: Podium, lighted with microphone. Lunch to be served seated or buffet style beginning at 12:00 Noon. The lunch will be paid under this contract.

D. 7. Conference Facilities For Friday, January 26

General Session Room must accommodate up to 80 persons and be available for use beginning at 8:00 a.m. to 9:00 a.m. Room to be set up theater style.

Audio Visual Requirements for General Session Room: Podium, dais for panel members, microphone on podium and dais table, overhead projector, projection screen, transparency markers, flip charts, easels and markers for chart paper.

Break Out Rooms: Three (3) break out rooms beginning at 8:00 a.m.-6:00 p.m. Rooms to accommodate 25 attendees. Rooms to be set-up as inverted U.

Audio Visual Requirements for Break Out Rooms: Two easels (2) per room, flip chart paper for each, color markers, overhead projector, projection screen, podium. VCR and color monitor for the entire day on Jan. 26.

E. 1. Type Of Contract:

This is a firm fixed price services contract.

F. 1. Banquet Services Refreshments, Meals And Break Time Schedules:

Contractor shall provide prefix menu suggestions and price per person for:

Dinner	January 21
Lunch	January 22
Lunch	January 25

The Government is seeking elegant presentation at a modest cost to ensure an attractive event. Menu suggestions shall be limited to the daily total meals and incidental expenses (M&IE) allotment of \$38.00 per day. (Federal Travel Regulations) Food and beverage functions are tax exempt, and exempt from gratuity/service charge of 18% and sales tax of 6%.

F. 2. Refreshments, Morning And Afternoon Breaks:

The contractor shall provide daily light refreshments for the morning and afternoon scheduled breaks. Light refreshments shall consist of coffee, tea, juice, assorted pastries/muffins, cold sodas (diet and regular), mineral water and cookies. The morning and afternoon refreshments will be paid under this contract.

F. 3. Meals And Reception

The contractor shall make all necessary arrangements for cocktail reception (cash bar), dinner, and luncheons. **The contractor shall ensure that menus do not include any alcoholic beverages at government expense.** If required, the contractor shall consider the dietary restrictions of the participants, and offer comparable, reasonable alternate meals as deemed reasonably necessary.

G.1. Communications

The contractor shall provide two (2) pair of walkie talkies for use by control room staff.

H. 1. Deposit/Billing/Payment Requirements

The contractor shall waive the requirement for deposit based on Federal Acquisition Regulations (FAR). Contingent upon final negotiated price, the government VISA card will be used to pay for costs outlined in the said contract. No other charges/billings to the government VISA card are authorized.

I. 1. Miscellaneous

Control Room must be located in conference facility area.

Lodging rooms must be provided no lower than the second (2nd) floor of the hotel.

Transportation to and from the Airport to the Hotel will be incurred by attendees and is excluded under the terms of this contract.

The contractor shall deliver lunch to the staff in the Control Room (number of staff personnel to be determined at later date).

The contractor shall ensure all tables in the meeting rooms are draped or skirted and 2

sets of keys are provided for the Control Room staffers.

The government shall ship or deliver conference materials at least 3 days in advance of the conference. Facilities for storage must be in close proximity to the registration and conference area.

J. 1. Americans With Disabilities Act

Contractor shall certify the facility meets American With Disabilities Act requirements (handicap accessible)

PART II THE SCHEDULE

Section B- Supplies or Services and Prices/Costs

SUPPLIES/SERVICES	Quantity	Unit	Unit Price	Total Price
I. Conference Room Facilities				
Control Room	1	10 Days		
Registration Area to accommodate approximately 170 persons	1	5 Days		
Private Reception Room for Cocktail Reception for 160 persons	1	1 Day		
Private Dining Room for 160 persons	1	1 Day		
General Session Room for 160 persons	1	5 Days		
Break Out Rooms to accommodate 50 people	26	4 Days		
-Jan 23: 4				
-Jan 24: 6				
-Jan 25 13				
8:30 a.m.-1:00 p.m.	1	35 persons		
1:00 p.m.-6:00 p.m.	3	25 persons		
2:00 p.m.-5:00 p.m.	9	9 people per room		
-Jan 26 3				
General Meeting Room for 80 persons	1	3 Days		
-Jan 23				
-Jan 24				
-Jan 25				
Banquet Hall for 200 persons Jan 25	1	1 Day		
Storage Space	1	3 Days		

PART II THE SCHEDULE

Section B- Supplies or Services and Prices/Costs

SUPPLIES/SERVICES	Quantity	Unit	Unit Price	Total Price
II. Meals and Refreshments				
Seated Dinner for 160 persons Jan 21	160	1 Day		
Working Lunch for 170 persons Jan 23	170	1 Day		
Working Lunch for 200 persons (Banquet Hall) Jan 25	200	1 Day		
Morning Snacks for 160 persons	160	5 Days		
Afternoon Snacks for 160 persons	160	5 Days		

PART II THE SCHEDULE

Section B- Supplies or Services and Prices/Costs

SUPPLIES/SERVICES	Quantity	Unit	Unit Price	Total Price
III. Audio Visual Equipment				
Microphones				
Sound System	1			
Music	1			
Voice Amplification	1			
Overhead projector				
Projection Screen				
Podium-lighted				
VCR and monitor with mobile cart	1			
IV. Equipment/Office Supplies				
Risers				
Dais				
Dais table				
Transparency markers				
Flip Charts				
Easels				
Markers				
Message Board for Registration Area	1	5 Day		
V. Telecommunications				
-Control Room:				
Telephone Sets	2	10 Days		
Outside phone line	2	10 Days		
Walkie talkies	2	5 Days		
Fax machines	2	10 Days		
Answering Machine	1	10 Days		

PART II THE SCHEDULE

Section B- Supplies or Services and Prices/Costs

SUPPLIES/SERVICES	Quantity	Unit	Unit Price	Total Price
V. Telecommunications-continued				
-Registration Area:				
Telephone set	2	1 Day		
Outside phone line	2	1 Day		
VI. Computer and Office Equipment for Control Room				
Computers	2	10 Days		
Laser Printers	2	10 Days		
Photocopier machine	1	10 Days		

JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

I recommend that the Department of Commerce negotiate only with Canon Incorporated

(Proposed Contractor (s))

for full service maintenance coverage

(Description of Supplies or Services)

Requisition No. VISA

Cost Estimate \$ 50,000.00

(Include basic contract period and all options or total systems life costs)

Requesting Activity ITA/DOA/OOMS

Contracting Activity Not Applicable

CERTIFICATION REQUIREMENTS

I certify that the attached narrative justification is accurate and contains complete data necessary to support the recommendation for other than full and open competition.

The requisitioner further certifies the the attached narrative justification verifies the Government's minimum needs or schedule requirements and any rationale used to justify other than full and open competition procedures.

* Requisitioner (Name & Title)

Signature

Phone No.

Date

Lisa Gallina, Sr. Prog. Analyst

202-482-5436

07/01/97

*The procurement request authorizing official, whose signature appears in block G of the Procurement Request (Form CD-435). Before requesting this acquisition, state the statutory authority for conducting this acquisition under "other than full and open competition" procedures in the following blank 41 USC 253 (c) (1) (use only one statutory authority). Also provide a narrative justification to this form. In accordance with FAR Subpart 6.3, the narrative justification must include the facts necessary to reasonably and legitimately lead to the use of the specific authority for other than full and open competition; including adequate information on the nature and/or description of the action being approved and a description of the supplies or services required to meet the agency's needs.

Note: Use of this form is optional when: (1) the justification contains all information required by FAR 6.303-2, is certified by the requisitioner and contracting officer and is approved at the appropriate levels; or (2) simplified acquisition procedures for acquisitions not exceeding \$100,000 are used, in which case the simplified documentation practices outlined in FAR 13. 106-2 may be followed.

STATUTORY AUTHORITY

41 USC 253 (c)(1) - Only one responsible source

The supplies or services required by the agency are available from only one responsible source and no other type of supplies or services will satisfy agency requirements.

41 USC 253(c)(2) - Unusual & compelling urgency

The agency's needs for the supplies or services is of such an unusual and compelling urgency that the government would be seriously injured unless the agency is permitted to limit the number of sources from which it solicits bids or proposals. (NOTE: This authority will not be approved if it is determined that the urgency is due to a lack of advance planning by the requiring activity. Solicitation from as many potential sources as is practicable under the circumstances required.)

41 USC 253(c)(3) - Industrial mobilization; or engineering, developmental, or research capability; or expert services

It is necessary to award the contract to a particular source or sources in order (a) to maintain a facility, producer, manufacturer, or other supplier available for furnishing supplies or services in case of a national emergency, or to achieve industrial mobilization, or (b) to establish or maintain an essential engineering, research, or development capability to be provided by an educational or other nonprofit institution or a federally funded research and development center or (c) to acquire the services of an expert for any current or anticipated litigation or dispute.

41 USC 253 (c)(4) - International agreement

The terms of an international agreement or a treaty between the United States and a foreign government or international organization, or the written directions of a foreign government reimbursing the agency for the cost of the acquisition of the supplies or services for such government, have the effect of requiring the use of procedures other than competitive procedures.

41 USC 253(c)(5) - Authorized or required by statute

A statute expressly authorizes or requires that the acquisition be made through another agency or from a specified source, or the agency's need is for a brand-name commercial item for authorized resale.

41 USC 253(c)(6) - National security

The disclosure of the agency's needs would compromise the national security unless the agency is permitted to limit the number of sources from which it solicits bids or proposals.

41 USC 253(c)(7) - Public interest

The head of the agency (Secretary of Commerce) determines that it is not in the public interest to use other than full and open competition in the particular acquisition concerned, and notifies Congress in writing of such determination not less than 30 days before award of the contract.

APPROVAL REQUIREMENTS

Contracting Officer - Not exceeding \$500,000:

Contracting Officer & Title	Signature	Phone No.	Date
-----------------------------	-----------	-----------	------

Contracting Activity Competition Advocate - Over \$500,000 but not exceeding \$10 million:

Contracting Activity Competition Advocate & Title	Signature	Phone No.	Date
---	-----------	-----------	------

Head of Contracting Activity (HCA) or HCA Designee - Over - \$10 million but not exceeding \$50 million:

Head of Contracting Activity/HCA Designee & Title	Signature	Phone No.	Date
---	-----------	-----------	------

Procurement Executive - over \$50 million

Procurement Executive & Title	Signature	Phone No.	Date
-------------------------------	-----------	-----------	------

NOTE: Use the total cost estimate specified on the front of this document in determining the necessary approvals. Each review must be preceded by lower level approval (s), e.g., over \$50 million all approvals are required.

NARRATIVE
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION

1. Nature and Description:

The proposed acquisition will be for full service maintenance agreements for the International Trade Admin.
Canon copier equipment inventory.

2. Description of Supplies or Services:

Full service maintenance agreements with Canon USA Inc.

3. Authority Cited:

Section 41 USC 253 (c) (1) Only One Responsible Source of the Federal Acquisition Regulation (FAR)
(Identify Statutory Authority)
is the statutory authority permitting other than full and open competition.

4. Justification:

The International Trade Administration currently has approximately 20 machines purchased from various GSA Schedule s.
No other source is available to provide maintenance on Canon USA Inc. equipment under the terms and conditions of the
GSA contract. Maintenance agreements are GSA Scheduled purchases.

Based on the research, the minimum needs of the International Trade Administration DOA/OOMS can only be satisfied
by the unique capabilities which are available from Canon USA Inc. (FAR 6.302-1(b)(1)).

(Vendor Name)

As prescribed by FAR 6.303-2(12)(b), I certify that the information provided above is complete and accurate to the best of my knowledge and belief.